

WILLIAMS & CONNOLLY LLP
Stephen D. Raber (SBN 121958)
David Horniak (SBN 268441)
680 Maine Avenue, SW
Washington, DC 20024
Telephone: 202-434-5000
Facsimile: 202-434-5029
Email: sraber@wc.com
dhorniak@wc.com

Attorneys for Defendant Mars, Incorporated

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

JENILE THAMES,

Plaintiff,

vs.

MARS, INCORPORATED,

Defendant

Case No. 22-cv-04145-JD

**STIPULATION TO EXTEND TIME TO
RESPOND TO THE COMPLAINT AND
TO SET BRIEFING SCHEDULE FOR
MOTION TO DISMISS**

~~PROPOSED~~ ORDER

IT IS HEREBY STIPULATED and AGREED by and between Plaintiff, Jenile Thames, and Defendant, Mars, Incorporated, pursuant to Federal Rule of Civil Procedure 6(b) and Local Civil Rule 6-1(a), that:

1. Defendant's deadline to file its motion to dismiss or otherwise respond to Plaintiff's Class Action Complaint served on July 20, 2022 ("Complaint") is extended to **September 30, 2022**. This change will not alter the date of any event or any deadline already affixed by Court order. This extension does not constitute a waiver of any claim, right, or defense.

THE PARTIES FURTHER STIPULATE AND AGREE, pursuant to Federal Rule of Civil Procedure 6(b) and Local Civil Rule 6-1(b) and subject to the approval of the Court, that:

2. Plaintiff's deadline to file an opposition to Defendant's motion to dismiss will be **November 3, 2022**.

3. Defendant's deadline to file a reply will be **November 17, 2022**.

STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT AND TO SET BRIEFING SCHEDULE
FOR MOTION TO DISMISS WITH ~~PROPOSED~~ ORDER – CASE NO. 22-cv-04145-JD

4. Hearing on Defendant's Motion to Dismiss will be scheduled to occur on
December 1, 2022.

Dated: August 26, 2022

Respectfully submitted,

BURSOR & FISHER, P.A.

WILLIAMS & CONNOLLY LLP

By: /s/ L. Timothy Fisher
L. Timothy Fisher

By: /s/ David M. Horniak
David M. Horniak

L. Timothy Fisher (SBN 191626)
Sean L. Litteral (SBN 331985)
Elvia M. Lopez (SBN 331986)
1990 North California Blvd., Suite 940
Walnut Creek, CA 94596
Telephone: 925-300-4455
Facsimile: 925-407-2700
Email: ltfisher@bursor.com
slitteral@bursor.com
elopez@bursor.com

Stephen D. Raber (SBN 121958)
David Horniak (SBN 268441)
680 Maine Avenue, SW
Washington, DC 20024
Telephone: 202-434-5000
Facsimile: 202-434-5029
Email: sraber@wc.com
dhorniak@wc.com

Attorneys for Plaintiff Jenile Thames

*Attorneys for Defendant Mars,
Incorporated*

ATTESTATION

Pursuant to Local Rule 5-1(h)(3), I hereby attest that each of the other signatories to
this document have concurred in the filing of this document.

/s/ David M. Horniak
David M. Horniak

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JENILE THAMES,

Plaintiff,

vs.

MARS, INCORPORATED,

Defendant

Case No. 22-cv-04145-JD

~~PROPOSED~~ ORDER EXTENDING
TIME TO RESPOND TO THE
COMPLAINT AND SETTING BRIEFING
SCHEDULE FOR MOTION TO DISMISS

Upon consideration of the Stipulation to Modify Schedule for Motion to Dismiss, it is hereby **ORDERED** that the Stipulation is **GRANTED**. Defendant's deadline to file Motion to Dismiss Plaintiff's Class Action Complaint is extended to September 30, 2022. Plaintiff's deadline to file an Opposition to Defendant's Motion to Dismiss is November 3, 2022. Defendant's deadline to file a Reply is November 17, 2022. Hearing on Defendant's Motion to Dismiss will be scheduled to occur on December 1, 2022.

Dated: August 29, 2022



JAMES DONATO
United States District Judge

cc: All counsel of record via ECF